

Stephen M. Sansom (#10678)
Brandon T. Christensen (#16420)
HOLLAND & HART LLP
222 South Main Street, Suite 2200
Salt Lake City, UT 84101
Tel: (801) 799-5897
smsansom@hollandhart.com
btchristensen@hollandhart.com

Anthony R. Zeuli (*Admitted Pro Hac Vice*)
tzeuli@merchantgould.com
Thomas Johnson (*Admitted Pro Hac Vice*)
tjohnson@merchantgould.com
MERCHANT GOULD P.C.
2200 Fifth Street Towers
150 South Fifth Street
Minneapolis, MN 55402-4247
Tel: (612) 332-5300
Fax: (612) 332-9081

Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
SOUTHERN REGION OF THE CENTRAL DIVISION**

CRYSTAL LAGOONS U.S. CORP. AND
CRYSTAL LAGOONS TECHNOLOGIES
INC.,

Plaintiffs,

vs.

DESERT COLOR MANAGER LLC,
DESERT COLOR ST. GEORGE LLC, AJ
CONSTRUCTION, INC., TRI-STATE
VENTURES, LLC d/b/a CAREFREE
HOMES – UTAH, COLE WEST HOME
LLC, HOLMES HOMES, INC., SULLIVAN
HOMES LLC, and PACIFIC AQUASCAPE
INTERNATIONAL, INC.,

Defendants.

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANTS TO ANSWER
OR TO OTHERWISE PLEAD AND TO
FILE OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

Case No. 2:20-cv-00851-BSJ

Judge Bruce S. Jenkins

JURY TRIAL DEMANDED

Plaintiffs Crystal Lagoons U.S. Corp. and Crystal Lagoons Technologies Inc. (“Crystal Lagoons” or “Plaintiffs”) respectfully request that the Court grant all Defendants the courtesy of a fourteen (14) day extension to answer or to otherwise respond to Plaintiffs’ Complaint (Dkt. 2) and respond to Plaintiffs’ Motion for Preliminary Injunction (Dkt. 10). As grounds in support thereof, the Plaintiffs state as follows:

1. Plaintiffs filed the above-titled action on December 3, 2020. On the same date, Plaintiffs’ also filed a Motion for Preliminary Injunction. (Dkt. 10.)
2. All Defendants were served on either December 7 or 8, 2020. (Dkts. 43-50.)
3. Pursuant to the Federal Rules of Civil Procedure and District of Utah Local Civil Rules, Defendants’ answers or other response to the Complaint would be due on December 28 or 29, 2020. Any response to the Motion for Preliminary Injunction would be due on December 21 or 22, 2020.
4. No Defendant has appeared in this action so far.
5. However, Plaintiffs’ counsel was contacted by several Defendants seeking an extension to answer or respond to the Complaint or respond to the Motion for Preliminary Injunction, or both.
6. Subject to this Court’s approval, Plaintiffs’ counsel consented to an extension of 14 days for both the deadline to answer or respond to the Complaint and the deadline to respond to the Motion for Preliminary Injunction.
7. The requested extension will move both deadlines past the upcoming holidays and provide Defendants a small amount of additional time to respond to both pleadings. This modest extension will not significantly delay the case and Plaintiffs were assured that the courtesy of agreeing to such an extension, subject

to the Court's approval, will not be used against them as a defense to the Motion for Preliminary Injunction.

Accordingly, there is good cause to grant this Stipulation. Plaintiffs, on behalf of all Defendants, respectfully request that the Court grant this short extension of fourteen (14) days such that all Defendants shall have until January 5, 2021, to file an opposition to Plaintiffs' Motion for Preliminary Injunction (Dkt. No. 10) and shall have until January 12, 2021, to answer or otherwise respond to Plaintiffs' Complaint (Dkt. No. 2). For the Court's convenience, a proposed order is submitted herewith.

Date: December 18, 2020

By: /s/ Stephen M. Sansom

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Counsel for Plaintiffs

Crystal Lagoons US Corp and Crystal Lagoons Technologies, Inc.